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## MEMO ENDORSED

June 14, 2024

### VIA ECF

The Hon. Victoria Reznik  
United States Courthouse  
Courtroom 420  
300 Quarropas Street  
White Plains, NY 10601

**RE:** M&K Imports, LLC v. Rejuveneda Medical Group, Inc. et al., Case No. 7:22-cv-02606-VB

Dear Judge Reznik:

We are counsel to Plaintiff M&K Imports, LLC ("Plaintiff" or "M&K Imports") in the above-referenced case.

We write to Your Honor jointly with counsel for Defendants Rejuveneda Medical Group, Inc. dba Regeneveda's and Thom E. Lobe (collectively with Regeneveda, "Regeneveda Defendants"), and with counsel for Defendants Patrick D. Crocker and the Crocker Law Firm PLLC aka Crocker & Crocker (together with Patrick D. Crocker, the "Crocker Defendants") regarding the status of this case, as ordered by the Court during a telephonic status conference on May 30, 2024.

The parties have worked diligently to schedule fact-witness depositions. Witness availability has hampered the ability to schedule all witnesses before the June 28 cutoff for fact-witness depositions. Currently, the parties have agreed to dates for four fact-witness depositions to take place between June 21 and July 12. The parties seek leave of the Court to conduct one party deposition after the July 15 cutoff for fact discovery. The parties anticipate that this deposition will take place in July and thus do not request an adjustment to any of the other discovery deadlines.

As discussed during the May 30 telephonic status conference, Plaintiff continues to pursue the deposition of one additional fact witness who resides outside the United States. Plaintiff anticipates that this deposition will be completed before the end of discovery and will not interfere with any of the other discovery obligations in this case.

At this time, the parties do not seek an additional status conference.

Respectfully submitted,

Richard De Palma

Copy: All Counsel of Record via ECF.

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The Court is in receipt of the parties' letter and thanks them for the update. The parties' request to conduct one party deposition after the July 15 cutoff for fact discovery is **GRANTED**. The parties should file a joint letter no later than **7/19/24** updating the Court on the status of discovery at that time.

SO ORDERED.

  
Hon. Victoria Reznik, U.S.M.J.

**Dated: 6/17/2024**